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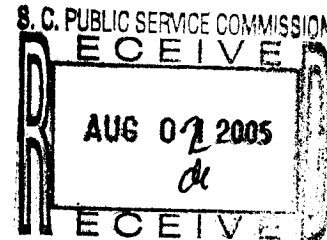
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August 1, 2005

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210



**Re: Petition of MCI metro Access Transmission Services, LLC
for Arbitration of Certain Terms and Conditions of Proposed
Agreement with Horry Telephone Cooperative, Inc. Concerning
Interconnection and Resale under the Telecommunications Act
of 1996
Docket No. 2005-188-C**

Dear Mr. Terreni:

Enclosed for filing in the above-referenced matter please find an original and ten (10) copies of the attached Horry Telephone Cooperative Inc.'s Objections to MCI metro Access Transmission Services, LLC's Interrogatories and Request for Production of Documents. By copy of this letter and certificate of service, all parties of record are receiving via U. S. mail a copy of the Objections to Interrogatories and Request for Production of Documents.

JL Please clock in a copy of this filing and return it in the self-addressed, stamped envelope provided.

Thank you for your assistance.

Very truly yours,

Margaret M Fox
Margaret M Fox

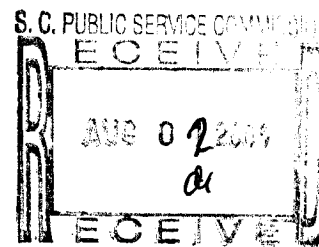
MMF/rwm
Enclosures

cc: Parties of Record

File Copy

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-188-C

In Re: Petition of MCImetro Access Transmission)
Services, LLC for Arbitration of Certain Terms)
and Conditions of Proposed Agreement with)
Horry Telephone Company, Concerning)
Interconnection and Resale under the)
Telecommunications Act of 1996)
_____)



HORRY TELEPHONE COOPERATIVE, INC.'S OBJECTIONS TO MCImetro ACCESS
TRANSMISSION SERVICES, LLC'S INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS

Horry Telephone Cooperative, Inc. ("HTC"), pursuant to the South Carolina Rules of Civil Procedure and the South Carolina Public Service Commission's Rules of Practice and Procedure (S.C. Code of Regulations R. 103-800, *et seq.*), objects generally and specifically to MCImetro Access Transmission Services, LLC's ("MCI") Interrogatories and Request for Production of Documents ("MCI Discovery"), served on July 20, 2005, as described below.

HTC is filing these objections in order to comply with MCI's request that HTC communicate to MCI any objections to the MCI Discovery within ten (10) days of service. These objections are preliminary in nature, and HTC reserves the right to amend, supplement, or revise these objections, and assert additional objections, should HTC discover additional grounds for objecting at any time prior to hearing.

General Objections to MCI's Discovery

1. HTC objects to MCI's Discovery to the extent that the requests are overly broad, lack specificity, or are unduly burdensome, excessively time-consuming, expensive, or oppressive, pursuant to the South Carolina Rules of Civil Procedure or applicable South Carolina law.

2. HTC objects to MCI's Discovery to the extent that the requests are irrelevant and not likely to lead to the discovery of admissible evidence pursuant to the South Carolina Rules of Civil Procedure or applicable South Carolina law.

3. HTC objects to MCI's Discovery to the extent that the requests seek discovery of information protected by attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege.

4. HTC objects to MCI's Discovery to the extent that the requests purport to impose discovery obligations on HTC beyond the scope of what is permitted under the South Carolina Rules of Civil Procedure or applicable South Carolina law.

5. HTC objects to MCI's Discovery to the extent that the requests purport to seek discovery of matters other than those subject to the jurisdiction of the Commission Pursuant to applicable South Carolina law.

6. HTC objects to all of MCI's Discovery that requires the disclosure of information that already is in the public domain, that is in the possession of MCI or is readily obtainable by MCI, or that is otherwise on record with the Commission.

7. HTC objects to MCI's Discovery to the extent that the requests seek information and discovery of facts known and opinions held by experts acquired and/or developed in

anticipation of litigation or for hearing and outside the scope of discoverable information pursuant to the South Carolina Rules of Civil Procedure or applicable South Carolina law.

8. HTC objects to MCI's Discovery to the extent that the information requested constitutes "trade secrets" or confidential research, development, or commercial information, or to the extent that the information requested would require the disclosure of customer-specific information.

9. HTC objects to MCI's Discovery to the extent that it utilizes terms that are subject to multiple interpretations, but are not properly defined or explained for purposes of the MCI Discovery, or to the extent that the terms used are incorrect or misleading.

10. HTC objects to the MCI Discovery that seeks to obtain "all," "each," or "every" document, item, or other such pieces of information to the extent that such discovery is overly broad and unduly burdensome.

11. HTC objects to the MCI Discovery to the extent such discovery seeks to have HTC create documents not in existence at the time of the request.

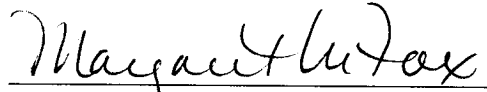
12. HTC objects to the MCI Discovery to the extent such discovery is not limited to any stated period of time, or pertains to a stated period of time that is longer than is relevant for purposes of the issues in this docket, as such discovery is overly broad and unduly burdensome.

13. HTC objects to each and every interrogatory or request for production that seeks information from or about any entity other than Horry Telephone Cooperative, Inc., as such information is not relevant to this arbitration, and such discovery is overly broad and unduly burdensome.

14. HTC objects to MCI's Discovery to the extent it seeks information not within HTC's possession, control, or custody or to the extent MCI's Discovery requests that HTC provide information that HTC does not maintain in the ordinary course of business.

Subject to and without waiving the general objections stated above, HTC intends to provide responses to interrogatories 1 and 2, and to item 1 of the requests for production of documents on or before August 19, 2005, as requested by MCI. HTC intends to object to item 2 of the requests for production of documents.

Respectfully submitted this 1st day of August, 2005.



M. John Bowen, Jr.
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(803) 799-9800

ATTORNEYS FOR HORRY TELEPHONE
COOPERATIVE, INC.

Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-188-C

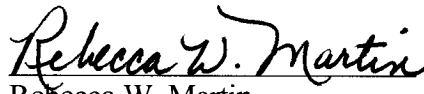
RE: Petition of MCImetro Access Transmission)	
Services, LLC for Arbitration of Certain Terms)	
and Conditions of Proposed Agreement with)	
Horry Telephone Cooperative, Inc. Concerning)	CERTIFICATE OF
Interconnection and Resale under the)	SERVICE
Telecommunications Act of 1996)	
_____)	

I, Rebecca W. Martin, Secretary for McNair Law Firm, P. A., do hereby certify that I have this date served one (1) copy of Horry Telephone Cooperative Inc.'s Objections to MCImetro Access Transmission Services, LLC's Interrogatories and Request for Production of Documents in the above-referenced matter on the following parties of record by causing said copy to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

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Kennard B. Woods, Esquire
MCI Law and Public Policy
Six Concourse Parkway
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Via Overnight Delivery


Rebecca W. Martin
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August 1, 2005

Columbia, South Carolina